

1 *[Submitting Counsel on signature page]*
2
3
4
5
6
7
8
9
10
11

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14

15 IN RE: SOCIAL MEDIA ADOLESCENT
16 ADDICTION/PERSONAL INJURY
17 PRODUCTS LIABILITY LITIGATION

MDL No. 3047
Case No 4:22-MD-03047-YGR
Honorable Yvonne Gonzalez Rogers
Honorable Peter H. Kang

18 This Document Relates to:
19 ALL ACTIONS
20
21
22

**STIPULATION AND ~~[PROPOSED]~~
ORDER TERMINATING JOINT
LETTER BRIEF REGARDING THE
APPROPRIATE NUMBER OF
CUSTODIANS AS TO SNAP INC. [ECF
NO. 890]**

1 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned
2 counsel, hereby stipulate and respectfully request that the Court terminate the Joint Letter Brief
3 Regarding the Appropriate Number of Custodians as to Defendant Snap Inc., ECF No. 890. The
4 parties declare in support of this request:

5 1. Plaintiffs and Defendant Snap Inc. ("Snap") filed the Joint Letter Brief Regarding
6 the Appropriate Number of Custodians as to Snap Inc. on May 23, 2024, ECF No. 890.

7 2. The parties continued to meet and confer following submission of the joint letter
8 brief and were able to reach a compromise regarding the dispute.

9 3. Accordingly, the dispute set forth in the joint letter brief has been resolved and is
10 now moot.

11 THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and
12 respectfully request that the Court terminate the Joint Letter Brief Regarding the Appropriate
13 Number of Custodians as to Snap Inc, ECF No. 890.

14
15 **IT IS SO ORDERED,**

16
17 DATED: June 4, 2024

18 
19 PETER H. KANG
20 UNITED STATES MAGISTRATE JUDGE

21 **IT IS SO STIPULATED AND AGREED.**
22
23
24
25
26
27

1 DATED: June 4, 2024

Respectfully submitted,

3 /s/ Lexi J. Hazam

4 LEXI J. HAZAM
5 **LIEFF CABRASER HEIMANN &**
6 **BERNSTEIN, LLP**
7 275 BATTERY STREET, 29TH FLOOR
8 SAN FRANCISCO, CA 94111-3339
9 Telephone: 415-956-1000
10 lhazam@lchb.com

11 PREVIN WARREN
12 **MOTLEY RICE LLC**
13 401 9th Street NW Suite 630
14 Washington DC 20004
15 Telephone: 202-386-9610
16 pwarren@motleyrice.com

17 Co-Lead Counsel

18 CHRISTOPHER A. SEEGER
19 **SEEGER WEISS, LLP**
20 55 CHALLENGER ROAD, 6TH FLOOR
21 RIDGEFIELD PARK, NJ 07660
22 Telephone: 973-639-9100
23 cseeger@seegerweiss.com

24 Counsel to Co-Lead Counsel

25 JENNIE LEE ANDERSON
26 **ANDRUS ANDERSON, LLP**
27 155 MONTGOMERY STREET, SUITE 900
28 SAN FRANCISCO, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

EMILY C. JEFFCOTT
MORGAN & MORGAN
633 WEST FIFTH STREET, SUITE 2652
LOS ANGELES, CA 90071
Telephone: 213-787-8590
ejeffcott@forthepeople.com

1 JOSEPH VANZANDT
2 **BEASLEY ALLEN**
3 234 COMMERCE STREET
4 MONTGOMERY, LA 36103
5 Telephone: 334-269-2343
6 joseph.vanzandt@beasleyallen.com

7 Federal/State Liaisons

8 MATTHEW BERGMAN
9 GLENN DRAPER
10 **SOCIAL MEDIA VICTIMS LAW CENTER**
11 821 SECOND AVENUE, SUITE 2100
12 SEATTLE, WA 98104
13 Telephone: 206-741-4862
14 matt@socialmediavictims.org
15 glenn@socialmediavictims.org

16 JAMES J. BILSBORROW
17 **WEITZ & LUXENBERG, PC**
18 700 BROADWAY
19 NEW YORK, NY 10003
20 Telephone: 212-558-5500
21 jbilborrow@weitzlux.com

22 JAYNE CONROY
23 **SIMMONS HANLY CONROY, LLC**
24 112 MADISON AVE, 7TH FLOOR
25 NEW YORK, NY 10016
26 Telephone: 917-882-5522
27 jconroy@simmonsfirm.com

28 ANDRE MURA
29 **GIBBS LAW GROUP, LLP**
30 1111 BROADWAY, SUITE 2100
31 OAKLAND, CA 94607
32 Telephone: 510-350-9717
33 amm@classlawgroup.com

34 ALEXANDRA WALSH
35 **WALSH LAW**
36 1050 Connecticut Ave, NW, Suite 500
37 Washington D.C. 20036
38 Telephone: 202-780-3014
39 awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 WALNUT STREET
SUITE 500
PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD.
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WALSH LAW
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@alexwalshlaw.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wcllp.com

SARAH EMERY
**HENDY JOHNSON VAUGHN EMERY
PSC**
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KY 40202
Telephone: 859-600-6725
semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: 646-666-8908
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.

**HENDY JOHNSON VAUGHN EMERY
PSC**

600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

**SIN-TING MARY LIU
AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**

17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

**JAMES MARSH
MARSH LAW FIRM PLLC**
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

**JOSEPH E. MELTER
KESSLER TOPAZ MELTZER & CHECK
LLP**

280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
jmeltzer@ktmc.com

**HILLARY NAPPI
HACH & ROSE LLP**
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212-213-8311
hnappi@hrsclaw.com

**EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY**
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

**RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC**
1500 ROSECRANS AVE., STE. 500

MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: 818-839-2333
rtellis@baronbudd.com
dfernandes@baronbudd.com

MELISSA YEATES
**KESSLER TOPAZ MELTZER & CHECK
LLP**
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com

DIANDRA “FU” DEBROSSE
ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205-855-5700
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

Attorneys for Individual Plaintiffs

1 DATED: June 4, 2024

Respectfully submitted,

2
3 MUNGER, TOLLES & OLSON LLP

4
5 By: /s/ Jonathan H. Blavin

6 Jonathan H. Blavin (State Bar No. 230269)

7 Natalie Moyce (State Bar No. 341326)

MUNGER, TOLLES & OLSON LLP

560 Mission Street, 27th Floor

8 San Francisco, CA 94105-3089

Telephone: (415) 512-4000

9 Email: jonathan.blavin@mto.com

Email: natalie.moyce@mto.com

10 Rose Leda Ehler (State Bar No. 296523)

11 Victoria A. Degtyareva (State Bar No. 284199)

Laura M. Lopez (State Bar No. 313450)

12 Rowley J. Rice (State Bar No. 313737)

Ariel Teshuva (State Bar No. 324238)

13 Faye P. Teller (State Bar No. 343506)

MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

14 Los Angeles, California 90071-3426

15 Telephone: (213) 683-9100

Facsimile: (213) 687-3702

16 Email: rose.ehler@mto.com

Email: victoria.degtyareva@mto.com

17 Email: laura.lopez@mto.com

Email: rowley.rice@mto.com

18 Email: ariel.teshuva@mto.com

Email: faye.teller@mto.com

19
20 Lauren Bell (*pro hac vice*)

MUNGER, TOLLES & OLSON LLP

21 601 Massachusetts Avenue NW, Suite 500 E

Washington D.C., 2000

22 Telephone: (202) 220-1125

Email: lauren.bell@mto.com

23
24 Attorneys for SNAP INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION

I, James J. Bilsborrow, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 4, 2024

By: James J. Bilsborrow
James J. Bilsborrow